



Department of Energy  
Ohio Field Office  
Fernald Environmental Management Project  
P. O. Box 538705  
Cincinnati, Ohio 45253-8705  
(513) 648-3155



4625

OCT 22 2002

Mr. James A. Saric, Remedial Project Manager  
United States Environmental Protection Agency  
Region V-SRF-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

DOE-0038-03

Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5<sup>th</sup> Street  
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**RESPONSE TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY CONDITIONAL  
APPROVAL OF DRAFT FINAL TECHNICAL MEMORANDUM FOR THE ON-SITE DISPOSAL  
FACILITY CELLS 1, 2, AND 3 BASELINE GROUNDWATER CONDITIONS**

Reference: Letter from T. Schneider, OEPA, to J. W. Reising, "Conditional Approval of  
Baseline Groundwater Conditions," dated September 24, 2002

The purpose of this letter is to transmit, for your review and approval, a draft response to the Ohio Environmental Protection Agency (OEPA) comment on the draft final Technical Memorandum for the On-Site Disposal Facility Cells 1, 2, and 3 Baseline Groundwater Conditions. The OEPA conditional approval (Reference) was based on the addition of text to the first bullet on Page 5-3 of the Technical Memorandum. Based on an October 8, 2002 telephone conversation with the commentor, it was agreed that the first bullet on Page 5-3 would be modified by adding the following text: "The annual trends/serial correlation assessment will include the 13 well-constituent combinations that currently show trends or serial correlation. Based on this assessment, control charts will be constructed for constituent-well combinations that no longer exhibit trend and/or serial correlation."

Enclosed please find a change page for Page 5-3 of the Technical Memorandum that incorporates the requested additional text.

4625

OCT 22 1992

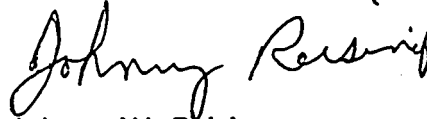
Mr. James A. Saric  
Mr. Tom Schneider

-2-

DOE-0038-03

If you should have any questions please contact Robert Janke at (513) 648-3124.

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:R.J. Janke

Enclosure: As Stated

cc w/enclosure:

R. J. Janke, OH/FEMP  
A. Murphy, OH/FEMP  
T. Schneider, OEPA-Dayton (three copies of enclosure)  
G. Jablonowski, USEPA-V, SRF-5J  
F. Bell, ATSDR  
M. Cullerton, Tetra Tech  
M. Shupe, HSI GeoTrans  
R. Vandegrift, ODH  
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

R. Greenberg, EM-31/CLOV  
N. Hallein, EM-31/CLOV  
D. Brettschneider, Fluor Fernald, Inc./MS52-5  
D. Carr, Fluor Fernald, Inc./MS2  
M. Frank, Fluor Fernald, Inc./MS90  
T. Hagen, Fluor Fernald, Inc./MS9  
W. Hertel, Fluor Fernald, Inc./MS52-5  
M. Jewett, Fluor Fernald, Inc./MS52-5  
T. Poff, Fluor Fernald, Inc./MS65-2  
ECDC, Fluor Fernald, Inc./MS52-7

Where possible, volumes of leachate generated will be tracked by cell, on a month by month basis.  
Liquid volumes generated from each cell's LDS will be tracked on a weekly basis.

4625

### 5.2.2 Post-Baseline Data Evaluation and Reporting

Post baseline data evaluation and reporting will consist of the following and in general will be reported in the annual site environmental reports unless otherwise noted. Annual reporting will begin in the 2002 Site Environmental Report.

- **Control charts:** Control charts will be updated annually as per Appendix C, Section C. Additionally, both trend and serial correlation will be evaluated during the process of updating control charts. Results of these evaluations will be provided annually. The annual trends/serial correlation assessment will include the 13 well- constituent combinations that currently show trends or serial correlation. Based on this assessment, control charts will be constructed for constituent-well combinations that no longer exhibit trend and/or serial correlation
- **Constituent concentration comparisons:** These graphical comparisons will be completed cell by cell for the horizontal till wells versus the LCS and LDS. The data used to generate these graphs (as well as the Great Miami Aquifer data) will be provided on the IEMP Extranet Site as it becomes available.
- **Horizontal till well water yields over time:** These graphical comparisons will be updated based on the water yielded prior to each of the quarterly sampling events.
- **Great Miami Aquifer monitoring well water levels versus total uranium concentration:** These graphical comparisons will be updated annually for each of cell's 1-3 up- and downgradient monitoring wells, based on the water levels and uranium results derived from the quarterly sampling events. Additionally, statistical analyses to determine the relationship between these two factors will be conducted annually.
- **Great Miami Aquifer monitoring well turbidity versus total uranium concentration:** These graphical comparisons will also be updated annually for each of cell's 1-3 up- and downgradient Great Miami Aquifer monitoring wells, based on the water levels and uranium results derived from the quarterly sampling events.
- **Cell-specific LCS and LDS volume yields:** This information will be tracked as noted in Section 5.2.1 and is currently reported on a weekly basis to EPA and OEPA via the weekly site facsimile. The volumes are discussed, as necessary, during the weekly site teleconference. Weekly LDS accumulation rates compared to precipitation will be provided semi-annually and annually in the IEMP reports. Monthly LCS and LDS volumes compared to precipitation will be reported annually. The LDS volumes will also be compared to waste placement volumes and reported annually. Monthly apparent liner efficiencies will be calculated and additionally reported annually.

The above noted monitoring, data evaluation, and reporting protocol will meet the needs of the on-site disposal facility leak detection program. As the program matures, it is recognized that ongoing enhancements to the program will be made as additional data are accumulated and evaluated. The enhancements will be communicated through the various reporting channels (e.g. weekly reports and the IEMP semi-annual reports) and will be documented in various revisions of the GWLMP.